

### **REMARKS**

Currently claims 6-10 and 33-41 are pending in the present application. By this response, additional remarks and arguments are added to further clarify Applicant's claimed invention, and hereby ask the Examiner to reconsider his basis for rejecting the claims based on those additional remarks and arguments.

Prior to conducting a substantive examination of the claimed invention in view of these additional remarks and arguments, the Applicant respectfully requests an In-Person Interview with the Examiner in charge of this application. In the event that the Examiner has not been contacted by the Applicant's representative to initiate scheduling an In-Person Interview, the Examiner is respectfully asked to contact the undersigned below to schedule a mutually convenient time for an In-Person Interview to discuss the patentable subject matter contained herein.

#### **I. Claim Rejections - 35 U.S.C. § 103**

The Examiner rejects claims 6-10 and 33-41 under 35 U.S.C. § 103(a) as being unpatentable over Eakins in view of U.S. Patent No. 6,801,641 to Eraslan (hereinafter "Eraslan") and further in view of Japanese Patent JP 06-215105 to Haruo (hereinafter "Haruo"). This rejection is respectfully traversed.

In addition to the foregoing remarks provided by the previous responses, we provide the following:

The present invention relates to searching for an image or sequence of images (still or video image) containing a specific object of interest to the searcher.

This is done by searching through stored representations of images or sequences of images. The stored representations represent each image or sequence of images by an object descriptor of an object in the image or sequence of images. The object descriptor includes a plurality of view descriptors (associated together to form the object descriptor) which are

descriptors of two-dimensional views of the object in the image or sequence of images from different perspectives. For example, the object descriptor includes a view descriptor of the object as it appears in the image or sequence of images (one two-dimensional perspective view) and view descriptors of the object in other two-dimensional perspective views (not appearing in the image or sequence of images). This can be done, for example, by a person viewing the image or sequence of images; who recognizes the object in the image and the perspective view (such as a top view of a car) and associates descriptors of other views of a car (side, rear, underneath, etc), the views being taken, for example, from a general database, and not from the subject image or sequence of images.

A search is initiated by inputting a query, which is a query descriptor of an object. The query descriptor is a representation of a specific object in a specific two-dimensional perspective view. The query descriptor is then compared with the stored object descriptors (for images or sequences of images) as described above. More specifically, for a stored object descriptor, the query descriptor is compared with each of the plurality of view descriptors in the object descriptor. If the query descriptor matches any of the view descriptors, the overall object descriptor is considered a match and the corresponding image or sequence of images is retrieved, even if the perspective view of this object in the query does not match the perspective view of the object in the image or sequence of images.

None of Eakins, Eraslan or Harou, alone or in combination, disclose the above features of the invention.

Eakins is not concerned with different two-dimensional perspective views of a three-dimensional object in an image. Eakins is not concerned with identifying an object in an image or sequence of images and considering other views of the same object. Eraslan is primarily concerned with generating a three-dimensional facial image from constituent parts, and not with searching for an image or sequence of images containing an object of interest. Eraslan does not disclose an object descriptor including a plurality of associated view descriptors of an object in different two-dimensional perspective views. Neither Eraslan nor Easkins discloses or suggests

searching by inputting a query descriptor representing a two-dimensional perspective view of a three-dimensional object and matching the query descriptor with each of said plurality of view descriptors in an object descriptor to identify a "matching" image or sequence of stages. Similar comments apply to Haruo, which merely discloses converting three-dimensional shape data to a two-dimensional plane. There is no object descriptor with associated different two-dimensional perspective views, and no searching by matching a query descriptor with each of a plurality of associated view descriptors. None of Eakins, Eraslan or Haruo discloses or suggests retrieving an image sequence of images including an object in a first perspective view by matching with a query descriptor of the object in a different perspective view.

The Examiner appears to assert that the claimed invention is obvious in view of a combination of three documents. We submit that there is no reason to combine the three documents and even if the documents are combined it does not lead to the invention.

In view of the above amendment, Applicant believes the pending application is in condition for allowance.

Conclusion

In view of the above remarks, it is believed that claims are allowable.

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact William D. Titcomb Reg. No. 46,463 at the telephone number of the undersigned below, to conduct an interview in an effort to expedite prosecution in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37.C.F.R. §§1.16 or 1.14; particularly, extension of time fees.

Dated: April 4, 2008

Respectfully submitted,

By  46 463

Michael K. Mutter

Registration No.: 29,680

BIRCH, STEWART, KOLASCH & BIRCH, LLP

8110 Gatehouse Road

Suite 100 East

P.O. Box 747

Falls Church, Virginia 22040-0747

(703) 205-8000

Attorney for Applicant